Attachment 10

STATEMENT OF WORK FOR A RCRA FACILITY ASSESSMENT

I. PURPOSE

A. Purpose - The purpose of the RCRA Facility Assessment (RFA) is to compile existing information and to fill in any data gaps to determine whether past or present handling, storage, treatment, transportation or disposal of any solid waste and/or hazardous waste could result or may have resulted in releases to media that have the potential to threaten human health and/or the environment.

B. Scope - the RFA consists of the following Tasks:

1. RFA Workplan
2. Preliminary Assessment Report
3. Sampling Visit
4. RFA Report

II. RFA WORKPLAN - The RFA Workplan shall contain the following elements:

A. Introduction/Purpose:

The RFA is the first step in the corrective action program. The purpose of the RFA is to obtain facility-specific information as follows:

1. Identify and gather information on releases or potential releases from the facility;
2. Evaluate and identify regulated units, Solid Waste Management Units (SWMUs), and other Areas of Concern (AOCs) for releases to all media;
3. Make preliminary determinations regarding potential or known releases of concern and the need for further actions and interim measures at the facility; and

4. Screen from further investigation those regulated units and SWMUs which do not pose a threat to human health or the environment.

B. Plan for Conducting the Preliminary Review:

1. In conducting a Preliminary Review (PR), the Respondent shall collect all pertinent information regarding the facility from at least the following State and EPA programs:

   a. RCRA

   b. Superfund

   c. Air

   d. TSCA

   e. Water

2. It will be necessary to make prior arrangements with each agency to review files, if any, for the facility. In general, at least one (1) week's notice is usually required in order to make the necessary arrangements with staff to ensure that all files that may be under staff review are returned to the file area. It is the Respondent's responsibility to ensure that all necessary arrangements are made with the appropriate file clerk for each entity to review the aforementioned files.

3. Information shall also be collected from the United States Geological Survey (USGS).

4. Information shall also be collected from the US Fish and Wildlife and State wildlife offices in regard to the Endangered Species Act.

C. During the PR, the Respondent shall determine to the extent possible:

1. All known or possible SWMUs and identify them regardless of whether the SWMUs (old, new or

existing) at the facility are currently, had been, or may be releasing hazardous constituents to the environment;

2. Whether or not there are SWMUs (old, new or existing) at the facility that are or may be releasing hazardous constituents to the environment including the extent of those releases;

3. The need for immediate corrective measures and the status of any prior corrective measures at this facility;

4. The focus of additional site investigation if needed;

5. The identification of wells within one mile of the facility and any information on these wells including depth, date of construction, type and purpose of construction and any analytical data; and,

6. The need for a health assessment both on-site and off-site.

D. Plan for Conducting the Visual Site Inspection:

The Respondent shall perform a Visual Site Inspection (VSI) to verify existing SWMUs/AOCs and to observe and document any additional SWMUs/AOCs and/or releases. The purpose of the VSI is to:

1. Identify all SWMUs/AOCs that pose no problem to human health or the environment;

2. Identify all SWMUs/AOCs which may present a threat to human health or the environment;

3. Gather evidence of releases sufficient to compel the owner/operator to conduct additional investigation;

4. Prioritize SWMUs/AOCs for further investigation; and

5. Identify the scope of subsequent investigations or, if needed, immediate corrective actions.

The Respondent shall coordinate the VSI agenda with the Project Coordinator at least thirty (30) days before performing the VSI. The VSI shall be conducted in accordance with Chapters Three and Five through Nine of the RFA Guidance.

E. Plan for Conducting the Sampling Visit.

If there are data gaps where a release cannot be determined, the Respondent shall develop and submit to the Project Coordinator a site-specific Sampling Plan for the Sampling Visit (SV). Upon approval of the Sampling Plan, Respondent shall implement the plan.

III. Preliminary Assessment (PA) Report - Upon completion of the PR and VSI the Respondent shall develop a Preliminary Assessment (PA) report incorporating the results of the PR and VSI efforts. The PA report shall contain all items set forth in the RFA Guidance including, but not limited to, the completed attached checklist, a detailed map of the facility with all well locations, list of all SWMUs and AOCs (regardless of release potential), description of each well (if known), photographic log, photographs, site geology, etc. The PA Report will make recommendations as to whether or not additional sampling is necessary to confirm or deny the release of any hazardous waste or hazardous constituents from any particular SWMU at the facility. In developing the PA Report, the Respondent shall provide strong supportable evidence for a decision either for or against additional sampling to fill data gaps at the facility. The PA Report shall include the following:

A. All existing data that is pertinent to accomplishing the objective of identifying all potential existing and closed solid waste management units(SWMUs), areas of concern (AOCs) and releases.

B. The data collected during the PR, including, at a minimum:

1. The former and current land use(s) within the facility boundaries and adjacent to the facility;

2. The former and current owner(s) and/or operator(s);

3. Former and current activities conducted, products produced, and processes conducted on-site;

4. Types and quantities of hazardous substances used on- site (sources of this information include manifests, inspections, MSDS, etc.);

5. Types and quantities of hazardous wastes generated at the facility;

6. Former and current waste handling and disposal practices;

7. The location of all past and present SWMUs at the facility, their dates of operation, wastes managed in each SWMU, construction details, and actual or potential releases of hazardous waste or hazardous constituents from each SWMU; The description of each SWMU and AOC in the PA Report shall include, but not be limited to:

   a. Name of SWMU or AOC;

   b. Description of SWMU/AOC (including the location, construction details, physical description, etc.);

   c. Start-up and closure dates of operation;

   d. Waste managed;

   e. Release controls;

   f. Release history; and

   g. Photographs (including any in existence prior to the VSI).

8. The location of all releases or potential releases of hazardous waste or hazardous constituents from AOCs, the date of release, and the volume of material released;

9. Status and types of permits obtained by the facility;

10. Any existing analytical data for all media (soil, sediment, groundwater, air, surface water, and subsurface gas);

11. Any wells at the facility;

12. Depth to groundwater and direction of groundwater flow at the facility;

13. Identification and a description of all wells within a one (1)-mile radius of the facility boundaries. The description of each well shall include the depth of the well, the date of construction, the type and purpose of construction, and presentation of any analytical data obtained from each well;

14. The uses of groundwater within a one (1)-mile radius of the facility boundaries;

15. The nearest downgradient surface water body;

16. Direction of surface water flow at the facility and uses of surface water within five (5) downgradient miles of the facility;

17. Endangered, threatened, or migratory species and critical habitats found in the area of the facility;

18. Predominant wind direction; and

19. Location of nearest residences, schools, and any sensitive populations.

The Project Coordinator will review the PA report and its recommendations. If supportable data of any release at the facility exists and leaves no data gaps, then upon the Project Coordinator's approval of the PA report, the Respondent shall proceed to develop the final RFA report including the incorporation of any Project Coordinator comments on the PA Report. If there are data gaps, then Respondent shall conduct a Sampling Visit (SV). Respondent must submit to the Project Coordinator for review and approval a Sampling Plan before conducting the SV.

IV. Sampling Plan - Respondent shall submit to the Project Coordinator a draft site-specific Sampling Plan as described in Chapter Four of the RFA Guidance. The Sampling Plan shall include a QAPP prepared in accordance with EPA guidance. Respondent shall conduct the Sampling Visit in accordance with the approved Sampling Plan and Chapter Four through Nine of the RFA Guidance. Respondent shall coordinate the visit with the Project Coordinator at least thirty (30) days prior to the date of the SV.

V. RFA Report - Respondent shall submit to the Project Coordinator a draft RFA Report incorporating the PR, VSI, and results of the SV. Respondent shall include, as appendices to the draft report, any supporting materials including, but not limited to, checklists, field notes, forms, letters, data, etc. The draft RFA report should be substituted for the PA report if no SV is conducted.

CHECKLIST AND SIGNATURE PAGE

_____ Completed in accordance with EPA Guidance
_____ Aerial photographs reviewed and information from them is incorporated into the submittal
_____ Historical operations and waste management practices investigated and incorporated into the submittal
_____ Summary/Table of Regulatory History that supports evidence of a release or potential release
_____ Figure illustrating surrounding land use
_____ Figure identifying each SWMU/AOC
_____ Figure illustrating surface water flow on- and off-site
_____ Figure illustrating groundwater flow direction
_____ Depth of groundwater stated
_____ Public and private wells identified within a one-mile radius of the facility
_____ Groundwater use within a one-mile radius of the facility
_____ SWMU/AOC summary table
_____ All statements, ideas, and recommendations substantiated with references

_____ Summary table of groundwater analytical data
_____ Summary table of soil analytical data including background analytical data
_____ Figure identifying sampling locations and sample identification numbers